



#### December 11, 2017

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RE: November 2017 Monthly Report of Activities

Butte Priority Soils Operable Unit

Unilateral Administrative Order (UAO) – EPA Docket No. CERCLA-08-2011-0011

#### Ladies and Gentlemen:

Pursuant to Paragraph 42 of the above referenced Order, Butte-Silver Bow submits the attached Monthly Report for activities performed at the Silver Bow Creek/Butte Area Superfund Site, as part and on behalf of the Group 1 Respondents. This monthly report covers work activities for November 2017.

Please contact me (497-6264) if you have any questions about the information in the report or need additional information about Butte-Silver Bow's work activities. Thank you.

Sincerely,



Julia Crain Superfund Program Data Administrator Butte-Silver Bow Planning Department

Attachment: Monthly Report

CC: Loren Burmeister, AR Project Manager

**BSB** Personnel

E-Mail version sent to List-Serve

# Monthly Report – November 2017 Butte Priority Soils Operable Unit Silver Bow Creek/Butte Area Superfund Site Unilateral Administrative Order (EPA Docket No. CERCLA-08-2011-0011)

As directed by Paragraph No. 42 of the *Unilateral Administrative Order for Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site (hereinafter, the Order)*, the City and County of Butte-Silver Bow provides this monthly report on work activities under the Order. The work activities described in this report are consistent with the directives contained in the Order/Remedial Action Work Plan, and cover those efforts performed by Butte-Silver Bow as part of the Group 1 Respondents, during November 2017.

# I. Operations and Maintenance Activities

## A. Source Areas/Butte Reclamation Evaluation System (BRES)

**Routine O&M.** In November, Source Area maintenance crews continued maintenance of sites throughout the Butte Hill. Crews completed routine O&M tasks such as trash pickup and disposal, fence repairs, and stormwater sediment basin, culvert, and inlet cleanout. Specific site work includes:

- BRES Site 29 Vegetative improvement work was conducted in areas affected by the Lexington Mine Yard Improvement project that was coordinated by Atlantic Richfield. 20 cubic yards of top soil was imported to the site and prepared for seeding. Seeding was conducted in accordance with the Butte Hill Revegetation Specifications utilizing the PAL seed mix. A rock lined ditch was constructed utilizing 2 cubic yards of six-inch minus to convey storm water to a newly installed drop inlet.
- BRES Site 5 Areas of the site impacted by fire were seeded in accordance with the Butte Hill Revegetation Specifications utilizing the PAL seed mix. The seed, fertilizer and mulch were applied utilizing the hydro-seeder.
- BRES Site 5 Samples were taken in the site that had been identified during the 2016 BRES evaluations as requiring vegetative improvement work. This area had also been affected by an additional fire at the site. The samples were collected to obtain data to be used for the Corrective Action Plan that will be implemented in the Spring of 2018.
- BRES Site 60 Repaired damaged fencing along the perimeter of the parking lot.
- BRES Site CB08 Trash and debris were removed from various areas of the site.

**BRES Program**. In November 2017, Staff continued development of the 2017 Field Evaluation of Reclaimed Sites Summary Report. Staff completed the report narrative and proceeded to develop the site maps to prepare the document for submittal in December 2017.

**Vegetation and Weed Controls**. In November, BSB Staff utilized the findings of the 2017 BRES evaluations to determine priorities for vegetation and weed control in spring of 2018.

**Native Plants.** Butte-Silver Bow prepared quarterly reports for July to September, and conducted research on planting techniques in drought conditions.

**Excavation Review and Oversight.** BSB personnel continue to monitor excavation and dirt-moving activities throughout the basin, including multiple Permits already issued. Coordination with contractors requires continued monitoring of access to the Mine Waste Repository. BSB personnel issued 55 Excavation and Dirt-Moving Permits during the month of November 2017; 42 permits were issued for properties in BPSOU:

- Footings/Foundations
  - o 1300 W. Park Street

- o 1300 W. Park Street
- o Mullin St., Lots 17-19
- Utility Repairs and Maintenance
  - o 140 W. Mercury Street
  - o 944 S. Wyoming Street
  - o 563 S. Arizona Street
  - o N. Arizona Street
  - o 1300 W. Park Street
  - o 905 Thirteenth Street
  - o 401 N. Wyoming Street
  - o 301 E Mercury Street
  - o 301 S. Main Street
  - o 501 ½ S. Colorado Street
  - o 501 S. Colorado Street
  - o 601 S Montana Street
  - o 620 W. Gold Street
  - o 208 ½ S. Washington Street
  - o 327 W. Galena Street
  - o 101 S. Montana Street
  - o 1030 Zarelda Street
  - o 1003 Hornet Street
  - o 1010 N. Henry Avenue
  - o 802 Zarelda Street

- o 735 Hornet Street
- o 855 Empire Street
- o 823 Empire Street
- o 825 Waukesha Street
- o 740 Empire Street
- o 1143 Lewisohn Street
- o 1145 Antimony Street
- o 1204 W. Woolman Street
- o 515 N. Emmett Street
- o 1025 Caledonia Street
- o 1215 W. Copper Street
- 1231 W. Quartz Street
- o 1231 W. Quartz Street
- o 1227 W. Granite Street
- o 1046 W. Park Street
- o 1135 W. Mercury Street
- o 1338 W. Porphyry Street
- o 1326 W. Gold Street
- o 1314 W. Gold Street
- o 1201 W. Gold Street
- o 1326 W. Platinum Street

**Institutional Controls (ICs)**. Butte-Silver Bow continues to manage its responsibilities to the Institutional Controls Program through education and training in Best Management Practices for stormwater and sediment controls, excavations of hazardous waste, and access to the Mine Waste Repository. B-SB personnel continue to work closely with local utility companies including NorthWestern Energy, Charter/Spectrum, Quest and others to coordinate Street Opening permits, Excavation & Dirt-Moving permits and others.

**Mine Waste Repository Maintenance.** The Mine Waste Repository continued operation with all active dumping directed to the lower, eastern bench which continues to be monitored and maintained on a regular basis.

- Removed snow from the Mine Waste Repository access road utilizing a truck with a plow.
- Removed snow from the Granite Mountain Memorial viewing area utilizing a snow blower.

## **B. Storm Water Operations and Maintenance Activities**

During November 2017 standard, routine work activities were completed. In addition to inspections and monitoring of facilities, BSB Crews completed the following:

- Continuous monitoring of Syndicate Pit, CB8, CB9 and HDDs;
- Snow was plowed from the access roads at CB8, CB9, CB1 and staging areas to allow for continued access.
- Snow was removed from various storm water structures to ensure storm water conveyance.
- Three areas of the Buffalo Gulch Channel were damaged by persons excavating in the area possibly searching for bottles. The three damaged areas where repaired by re-grading and rock armoring the areas. 62 cubic yards of six-inch minus was imported to the site as rock armoring. The discharge point for the Buffalo Gulch Pipe was rock armored by importing 12 cubic yards of six-inch minus to prevent future erosion damage.

- CB9 inlet rock lined ditch 168 cubic yards of sediment and rock armoring were removed from the ditch. 108 cubic yards of 12-inch minus was imported and placed as rock armoring. 50 cubic yards of sediment will be screened from the removed materials and the remaining rocks will be reused for future repairs.
- The second of the required biannual inspections of all Superfund Storm Water Structures was completed. The inspections will be utilized to prioritize Storm Water O&M activities. No significant issues were discovered during the inspections.

**Superfund Storm Water Structures Inspections:** BSB personnel continue routine inspections of storm water facilities, storm water features and storm water structures.

**Superfund Storm Water Structures Operations and Maintenance Plan:** Comments on the BPSOU 2016 Interim O&M Plan for the BSB Superfund Stormwater System were provided November 29 and is currently considering agency comments to this document.

MPDES Storm Water Permit Assistance & Monitoring – MS4: MPDES Storm Water Permit Assistance & Monitoring – MS4: Butte-Silver Bow and its consultants continue to implement requirements of its Municipal Separate Storm Sewer System (MS4) permit. The MS4 permit requires the BSB develop a Storm Water Management Program (SWMP) that addresses six control measures: public education, public involvement, illicit discharge detection and elimination (IDDE), construction site storm water control, post-construction site storm water control, and pollution prevention/good housekeeping. Activities completed under each control measure are detailed below:

- BSB completed the annual MS4 report as required in Section I under Part IV. Monitoring, Recording and Reporting Requirements for the General Permit.
- Butte-Silver Bow Public Works and its consultants provide engineering support and assistance
  in reviewing storm water design plans for proposed developments in Butte, as required by the
  City-County Storm Water Ordinance. Assistance regarding storm water requirements was
  provided to potential developers as requested.
- MDEQ has decided to administratively extend the existing MS4 permit for the years 2015-2016 while a working group conducts meetings develops new permit requirements. BSB and its consultant WET have participated in multiple permittee-stakeholder meetings on this topic and will take part in the working group meetings.
- BSB began meeting with the other MS4 Cities to develop a MS4 permit that is acceptable to the cities and DEQ.

## C. Water Quality District Activities

Water Quality District Completed the following tasks in October 2017:

- Reviewing and preparing comments for Montana DEQ's Fourth Five-Year Review Report for the Montana Pole and Treating Plant Site
- Reviewing EPA's Comment Letter for BPSOU 2015 Draft Interim Ground Water Monitoring Data Summary Report
- Continued work with MBMG and agencies regarding the expansion of the domestic well sampling program
- General oversight of well site locations for Performance Management Plan for Parrot Tailings Removal Project
- Conducted visual surveys of Domestic Well for the potential expansion of controlled ground water districts.
- Developed spread sheet of field notes collected during visual surveys
- Reviewed sampling results for domestic wells within controlled ground water districts.

### **D. GIS Activities**

Primary work in the reporting period included:

- Updated property/parcel shapefile on ArcGIS Online.
- Queried ArcGIS Online for October 2017 Operations and Maintenance data and exported for analysis and preparation of the October monthly report.
- Plotted a map of Centerville skating rink for Paddy Dennehy.
- Scanned and emailed West Side Soils maps and data to Bob Alexander, CDM Smith.
- Scanned maps of West Side Soils for archival on server.
- Completed park template map for RMAP program.
- Completed park property pap for RMAP program.
- Imported park list and selected appropriate geocode for each parcel to create map for RMAP program.
- Imported and stored the Survey123 database structure on AGOL and server.
- Imported additional parks list to create a point shapefile to create an AGOL RMAP map.
- Created an AGOL RMAP webapp for remediation of parks shapefile.
- Created a map of the Yankee Doodle Creek canyon area, 1955-61.
- Mapped BSB Tree Pod locations.
- Updated BPSOU/BRES site webmap.
- Updates to BRES site webapp.
- Superfund database update meeting and demonstration.
- Conducted review of BRES, AGOL, and Survey123 web app.
- Weekly review of ArcGIS Online for O&M and Stormwater Inspection data. Data download
  and entry into the BRES database; spatial data downloaded for QA/QC and archival on the
  BSB GIS system.

## II. Residential Metals Abatement Program

A number of standard work activities are on-going and addressed each month, including:

- Identifying soil, attic and cap protection projects.
- Data base and GIS tracking system; progress and annual reports
- Completion statements and deed attachments for projects completed
- Re-insulating properties previously abated
- Paint inspections
- EBL investigations
- Residential soil/basement sampling
- Residential attic sampling
- Residential interior dust sampling
- Provide use of HEPA vacuums
- Provide blood lead sampling through WIC clinic and establish database for blood lead results

**Projects in Progress** (December 2017)

2101 Phillips – Attic 808 S. Montana – Attic 1018 Maryland – Soil Galena St. Lot – Soil 216 N. Clark – Soil 45 W. Woolman – Basement 1131 W. Silver – Basement

## **Projects Completed:** (November 2017)

9205 US Highway 10 – Attic (re-clean)

434 S. Colorado – Attic

415 Pennsylvania – Attic

3225 Bayard – Attic

112 S. Alabama – Attic

506 W. Aluminum – Attic

1805 Carolina – Attic

1020 N. Henry - Attic

15 O'Neill – Attic

59 W. Broadway – Attic

949 Antimony – Basement

610 W. Mercury – Basement

223 Virginia – Soil

625 S. Wyoming - Soil

### **Upcoming projects:**

513 N. Montana – Attic

1212 W. Silver - Attic

2715 Edwards – Attic

112 W. Silver – Attic

1041 Oregon – Basement

513 N. Montana – Garage floor

1416 W. Gold - Soil

Projects Completed in (2017) – 115 Properties Sampled in (2017) – 190 Mailers sent in (2017) - 600